

U.S. EPA

CERCLA SECTION 104(e)

INFORMATION REQUEST

Please note: This Information Request includes instructions for responding to this request and definitions of words such as "Respondent," "Property," "Material," "Identify," and "Investigation Area" used in the questions. Please provide responses to all the questions in this Information Request for each Property identified in response to Question 4 of Section 2.0, when appropriate. You must answer the Questions in this Information Request related to properties or facilities outside the Investigation Area if Question 4, Section 2.0 specifically instructs you to do so. For each response clearly identify the Property or Properties to which the response applies.

HAL NORTH AMERICA INC. RESPONSE TO

EPA REQUEST FOR INFORMATION

RE: PACIFIC NORTHERN OIL CORP.

Introduction to Response: By letter dated February 9, 2011, the U.S. Environmental Protection Agency, Region 10 (EPA) issued this First Request for Information regarding the Portland Harbor Superfund Site (the Site) to HAL North America Inc. (HAL NA). By letters dated May 24, 2011, and August 15, 2011, EPA granted extensions of time for HAL NA to submit its Response to this Information Request to November 15, 2011.

While addressed to "HAL North America, Inc.", EPA's February 9, 2011 letter issuing this Information Request specifically and expressly seeks information "Re: Pacific Northern Oil Corporation", a former subsidiary of HAL NA. Thus, while HAL NA as the addressee of the Information Request is the "Respondent", its Response is accordingly limited to matters regarding Pacific Northern Oil Corp. (PNO).

PNO and its then-parent company, Pacific Northern Inc. (PNI), closed the sale of substantially all of their assets to third parties on October 29, 1999, and dissolved as corporations on February 2, 2000. As such, neither PNO nor PNI has any officers, directors, managers, or employees, nor maintains any place of business or central file repository. That inevitably has made it more difficult to locate sources of potentially responsive information and documents regarding PNO and its historical activities within what is now the Site Investigation Area. Nevertheless, Respondent has made good faith efforts to obtain relevant information and documents and to respond adequately to EPA's Information Request.

INFORMATION REQUEST QUESTIONS [AND RESPONSES]

Section 1.0 Respondent Information

1. Provide the full legal, registered name and mailing address of Respondent.

RESPONSE: HAL North America Inc.
2025 First Avenue, Suite 700
Seattle, WA 98121

2. For each person answering these questions on behalf of Respondent, provide:

- a. full name;

RESPONSE: Mr. Dana Behar

- b. title;

RESPONSE: President

- c. business address;

RESPONSE: HAL North America Inc.
2025 First Avenue, Suite 700
Seattle, WA 98121

- d. business telephone number, electronic mail address, and FAX machine number.

RESPONSE: Telephone: (206) 448-5080
Facsimile: (206) 448-5075
Email: dbehar@halrealestate.com

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.

RESPONSE: Please address any future correspondence concerning this Site to:

Mr. Dana Behar
President
HAL North America Inc.
2025 First Avenue, Suite 700
Seattle, WA 98121
Telephone: (206) 448-5080
Fax: (206) 448-5075
Email: dbehar@halrealestate.com

With a copy to:

Mr. Thomas M. Kilbane
Short Cressman & Burgess PLLC
999 Third Avenue, Suite 3000
Seattle, WA 98104
Telephone: (206) 682-3333
Fax: (206) 340-8856
Email: tkilbane@scblaw.com

Section 2.0 Owner/Operator Information

4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937 – Present). Please note that this question includes any aquatic lands owned or leased by Respondent.

RESPONSE: From December 20, 1979, to October 29, 1999, Pacific Northern Oil Corp., a Washington corporation (PNO), leased from Northwest Natural Gas Company, an Oregon corporation (NWNG), and operated a marine fuel terminal on a portion of the property owned by NWNG located at 7900 NW St. Helens Road, Portland OR 97210. The leased premises (sometimes referred to herein as the "Portland Marine Terminal") changed over the years, but included aboveground fuel storage tanks and piping, an office building, a warehouse/maintenance building, an operations building, a truck loading facility, and associated real property, as well as non-exclusive rights to use the common access road and parking area, oil pipeline, railroad spur, dock, and related piping, pumping, and other support facilities. The Portland Marine Terminal is located along the northwest bank of the Willamette River at approximately River Mile 6.5. Copies of the 1979 and 1994 Lease Agreements and a map of PNO's leased premises as they existed in 1994 are included in Attachment No. 7.

To the best of Respondent's knowledge, the Portland Marine Terminal was the only Property that PNO historically owned, leased, operated, or was otherwise affiliated with within the Investigation Area during the period of investigation (1937 – Present). Accordingly, all references to the "Property" in the remainder of this Response to EPA's Information Request pertain to the Portland Marine Terminal Property identified above.

Notably, the Portland Marine Terminal Property leased to and operated by PNO was a portion of a larger property that was and is owned by NWNG, referred to herein as the NWNG property. The NWNG property in turn was a portion of a much larger industrial property that was formerly owned by NWNG's corporate predecessor, Portland Gas and Coke Company (GASCO), which operated a manufactured gas plant and associated facilities on that property, referred to herein as the GASCO site. During the period that PNO leased the Portland Marine Terminal Property from NWNG, the NWNG property also included a liquefied natural gas storage facility operated by NWNG that shared the